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September 25, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

**Re: *Abbott Laboratories v. Feinberg*, Consolidated Case No. 18 Civ. 8468 (LGS)
(Related Former Case No. 19 Civ. 600 (LGS)) (the "Action")**

Dear Judge Schofield:

We represent Defendants Nancy Feinberg, Hope Feinberg Schroy, and David Feinberg as co-executors of the Estate of Carol Feinberg ("Defendants") in the above-referenced Consolidated Action. Pursuant to Section I.D.3. of the Your Honor's Individual Rules and Procedures for Civil Cases, we write to respectfully request the Court's permission to file Defendants' Proposed Findings of Fact and Conclusions of Law in redacted form and under seal.

At Plaintiff Abbott Laboratories' ("Plaintiff") request, the Court has permitted sealed filings with respect to the identity of certain artworks relevant to this Action. Out of respect to those filings, Defendants are seeking permission to file their Proposed Findings of Fact and Conclusions of Law in redacted form and under seal. However, Defendants respectfully submit that, where the matter is about to proceed to trial, the public's right to know should now control.

The application is GRANTED. Defendants may file their Proposed Findings of Fact and Conclusions of Law in redacted form and under seal. The Court has reviewed the materials, and the proposed redactions are narrowly tailored to prevent the disclosure of information that could impair the value of the artwork at issue, as well as other artworks. See, e.g., *CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 14 Civ. 1897, 2017 WL 4750701, at *4 (D. Conn. July 12, 2017) (allowing for redactions of "commercially sensitive" information).

SO ORDERED

Dated: September 28, 2020
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE